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April 9, 2025

Hon. Justice Pamela K. Chen
United States District Court
Eastern District of New York
Courtroom: 4F
225 Cadman Plaza East
Brooklyn New York 11201

AMENDED LETTER MOTION

Re: IME WatchDog, Inc. v. Gelardi, et al.
Case No.: 1:22-cv-1032 (PKC) (JRC)

Dear Honorable Justice Chen:

This office represents Eugene Liddie (Liddie) and IME LegalReps (IMELR), non-parties in the above-referenced action, (collectively “non-parties” herein).

This amended letter motion stands to correct the statement that the Plaintiff’s do not object to the extension requests herein. This office misunderstood Plaintiff’s position with respect to whether they object or not. Plaintiff has expressed that they do object to the extension requests.

This office respectfully requests extensions of time to respond to two (2) pending applications and to notify the NYPD of the Court’s Memorandum and Order by Plaintiff.

Specifically, the non-parties respectfully request an extension of time to respond to Plaintiff’s motion for a pre-motion conference (ECF No. [449](#)). On April 2, 2025, the Court directed the non-parties to respond by April 9, 2025. We now respectfully request an extension until April 15, 2025 to file our response.

In addition, non-parties respectfully request that the Court set and/or extend the time to notify the NYPD of the Court’s Memorandum and Order to a specific date of April 15, 2025, or later. This extension of time will allow our office to discuss the consequences of such reporting with our client.

Liddie and IMELR also seeks an extension of time to respond or object to the proposed language in Plaintiff’s Court-ordered notice, submitted on April 7, 2025 (ECF No. [450](#)) to April 15, 2025.

The extensions are requested due to current scheduling issues within this office. We respectfully submit that the additional time requested will assist our office in providing proper responses to the abovementioned applications.

There will be no prejudice in any way by granting the requested brief extensions. We thank the Court for its consideration of this request.

Respectfully Submitted,



KAREN CHARRINGTON, ESQ.

Cc: Counsels of Record – via ECF